

REMARKS

Claims 1-13 remain pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections set forth in the Office Action of September 13, 2005, in view of the remarks contained herein.

Rejection Under 35 U.S.C. §102

Claims 6-10 stand rejected under 35 U.S.C. §102(e) as being anticipated by Morton (U.S. Patent No. 6,365,221). The rejection is respectfully traversed.

In response to Applicants' prior reply of June 20, 2005, the Examiner has failed to address the distinction in independent claims 6 and 10 over Morton - viz. each manipulator arm "mounted to a different surface of a common mounting stand". Morton, in Fig. 3, teaches robots 14 located on separate parallel tracks located at opposite sides of the booth. Robot 22 of Morton is mounted to a separate gantry 20. The Morton robots each have their own separate dedicated mounting bases 30--not "a common mounting stand".

The Examiner's remark that "the definition of cluster fits into the task of the [Morton] robots, since they are working in a confined area" is simply not understood. Because robots are in a "confined area" does not dictate that they are "clustered". Independent claims 6 and 10, and claims 7-9 depending from claim 6, are believed to be patentably distinguishable over Morton.

Rejection Under 35 U.S.C. §103

Claims 1-5, 12 and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Anfindsen (U.S. Patent No. 6,309,464 B1).

The rejection is respectfully traversed.

Independent claims 1, 5 and 12 call for “at least two of the plurality of arms having different lengths”. Applicants’ undersigned representative has carefully reviewed both cited references to Morton and Anfindsen and can find no teaching, verbal or pictorial, of robot arms having different lengths.

The Examiner cites Fig. 3 of Morton. Which are the robot arms of different lengths? They all appear to be of the same length, and there is nothing in the Morton written description to even suggest otherwise.

Similarly, in the Anfindsen reference, the Examiner cites Figs. 3 and 32 (sic. - ??) for a teaching of arms having different lengths. Fig. 3 shows only a single arm. Fig. 2 appears to show arms of the same length. Again, there is nothing in the Anfindsen written description suggesting different arm lengths.

The Examiner’s assertion that to have arms of different lengths is “an obvious matter of design” is unsupported by the record--other than by resort to impermissible hindsight use of Applicants’ instant disclosure. Claim 1, its dependent claims 2-4, claim 5 and claim 12, with its dependent claim 13, are believed to be patentably distinguishable over Anfindsen.

Allowable Subject Matter

Applicants gratefully acknowledge the allowability of claim 11.

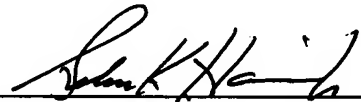
Conclusion

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests

that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By: 
Gordon K. Harris, Jr.
Reg. No. 28615

HARNESS, DICKEY & PIERCE, P.L.C.
P.O. Box 828
Bloomfield Hills, Michigan 48303
(248) 641-1600

GKH/al